

Appl. No. 10/670,545
Armdt. Dated August 17, 2005
Reply to Office action of June 17, 2005

REMARKS/ARGUMENTS

Claims 1-41 remain in the application. Claims 18-32 and 37-39 which were previously withdrawn following a restriction requirement are cancelled. Claims 1, 33 and 35 are amended to more distinctly describe the subject matter of the invention.

A. Telephone interviews.

The courtesy of telephone interviews on July 29, 2005 and August 9, 2005 to discuss the rejection of claim 1 and the rejection of claims 40-41. It was agreed that finality of the June 17, 2005 office action would be withdrawn.

B. Rejections under 35 U.S.C. 102.

Claims 1-17, 33-36 were rejected under 35 U.S.C. 102 based upon Shaffer et al. This rejection is respectfully traversed.

Claim 1 calls for, among other things, transaction data related to a channel participant. Applicant's maintain that Schaffer does not show transaction data. The office action states that the linkage key contains the ability to process transactions. However, "containing the ability" to perform a claim limitation is not a proper standard under 35 U.S.C. 102. Moreover, the linkage key does not relate to any particular transaction. The linkage key is provided explicitly by a customer or derived from information provided by a customer, and does not come from a transaction nor is it related to a transaction.

Applicants maintain that the Office action does not allege that Shaffer et al. show a candidate identification mechanism. The words "candidate identification mechanism" do not appear in the Office action mailed January 12, 2005 and only appear in the office action mailed June 17, 2005 when quoting Applicant. There is no place where the Office action states that this element of claim 1 is shown by Schaffer or where it is shown. Hence, the Office action fails to state a *prima facie* case of anticipation and the rejection should be withdrawn.

In the spirit of cooperation claims 1 and 33 are amended to clarify that the candidate identification mechanism identifies more than one candidate reference record. Shaffer et al. do not entertain the concept of more than one candidate record. Shaffer et al. teach that an identifier will unambiguously point to a single,

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specific database record in any given database. In fact, Shaffer's system would fail if the identifier pointed to more than one record. One example of where Shaffer's method would fail is multiple businesses residing at the same address (such as in the same office building). In this case each business would have the same spatial identifier (and hence be ambiguous) until subsequent lexical or other non-spatial matching techniques were applied.

In contrast, the invention of claim 1 recognizes that in real-world situations transaction data is often ambiguous. The invention of claim 1 allows for identification of more than one candidate record. The matching mechanism is then used to match a subset of the candidate records (e.g., one candidate record) to the transaction data. Shaffer et al. do not need to use matching mechanism for this purpose.

For at least these reasons claim 1 is not shown or suggested by the Shaffer et al. reference. Claims 2-17 that depend from claim 1 are allowable for at least the same reasons as claim 1 as well as the individual limitations presented in those dependent claims.

Further, Applicants maintain that Shaffer et al. do not show or suggest lexical matching as called for in claim 13. The office action mailed June 17, 2005 does not respond to this argument made previously in the response filed March 25, 2005. The cited portions of Shaffer et al. have nothing to do with lexical matching. Also, the cited portions of Shaffer do not show or suggest any selection process as called for in claims 16-17. It is respectfully requested that the rejection of claims 1-17 be withdrawn.

The Office action rejects claims 33-34 for the same grounds as claim 1. However, claims 33-34 include limitations that do not appear in claim 1. Applicants maintain their position that the Office action fails to state a *prima facie* case of anticipation. The office action mailed June 17, 2005 does not respond to this argument made previously in the response filed March 25, 2005. Taken together, the office actions of Jan. 12, 2005 and June 17, 2005 never state that Shaffer shows "generating a transaction record comprising data that imprecisely identifies at least one channel participant" or "business information having greater precision than the

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transaction record". For these reasons the rejection of claims 33-34 should be withdrawn.

Moreover, independent claim 33, as amended, calls identifying more than one reference record in the reference record database. For at least these reason claims 33 and 34-36 that depend from claim 33 are allowable over the relied on reference.

C. Claims 40 and 41.

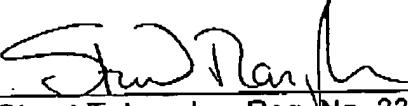
With respect to claims 40 and 41, no rejection has yet been stated against these dependent claims. Accordingly, claims 40 and 41 are allowable not only for the reasons stated in reference to claim 1, but also because the office action fails to state a *prima facie* case of obviousness of these claims. Further, the Schaffer reference does not show a "learning database" as called for in claim 40 nor the mechanism for populating the learning database called for in claim 41.

D. Conclusion.

In view of all of the above, the claims are now believed to be allowable and the case in condition for allowance which action is respectfully requested. Should the Examiner be of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is requested to contact Applicants' attorney at the telephone number listed below.

Any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

Respectfully submitted,



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